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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
JOSEPH MURPHY, <u>et al.</u> ,	:	
	:	Case No. 08-CV-4196 (GEL)
Plaintiffs,	:	
v.	:	
ALLIED WORLD ASSURANCE	:	
COMPANY (U.S.), INC. and ARCH	:	
INSURANCE COMPANY,	:	
Defendants.	:	
-----X	:	

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Robert W. DiUbaldo a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

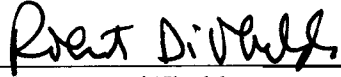
John D. Hughes
Edwards Angell Palmer & Dodge LLP
111 Huntington Avenue
Boston, MA 02199
(617) 239-0100 (phone)
(617) 227-4420 (fax)

RECEIVED
JUN 17 2008
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

John D. Hughes is a member in good standing of the Bar of the State of Massachusetts and the State of New York. There are no pending disciplinary proceedings against John D. Hughes in any state or federal court.

Dated: New York, New York
June 16, 2008

654213 825 6/17/08 2



Robert W. DiUbaldo
EDWARDS ANGELL PALMER & DODGE LLP
750 Lexington Avenue, 8th Floor
New York, New York 10022
(212) 308-4411
*Attorneys for Defendant Allied World Assurance Company
(U.S.), Inc.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JOSEPH MURPHY, et al., :
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Plaintiffs, :
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ALLIED WORLD ASSURANCE :
COMPANY (U.S.), INC. and ARCH :
INSURANCE COMPANY, :
:
Defendants. :
:
-----X

Case No. 08-CV-4196 (GEL)

AFFIDAVIT OF ROBERT W. DIUBALDO
IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

State of New York)
)
County of New York) ss:

Robert W. DiUbaldo, being duly sworn, hereby deposes and says as follows:

1. I am an associate at Edwards Angell Palmer & Dodge LLP, counsel for Defendant Allied World Assurance Company (U.S.), Inc. ("Allied World") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Allied World's motion to admit John D. Hughes as counsel pro hac vice to represent Allied World in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in New York in February 2005. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known John D. Hughes since 2006.
4. Mr. Hughes is a partner at Edwards Angell Palmer & Dodge LLP in Boston, Massachusetts.
5. I have found Mr. Hughes to be a skilled attorney and a person of integrity. He

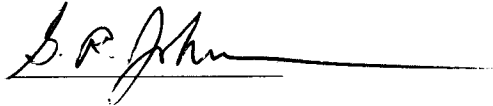
is experienced in federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Mr. Hughes *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of John D. Hughes *pro hac vice*, which is attached hereto as **Exhibit A**.

WHEREFORE it is respectfully requested that the motion to admit John D. Hughes, *pro hac vice*, to represent Allied world in the above captioned matter, be granted.

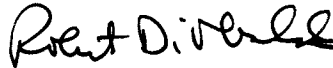
Dated: New York, New York
June 16, 2008

Sworn to before me
This 16th day of
June, 2007



GREGORY R. JOHNSON
Notary Public, State of New York
No. 01JO6116160
Qualified in New York County
Commission Expires September 20, 2008

Respectfully submitted,



Robert W. DiUbaldo (RD 4484)
EDWARDS ANGELL PALMER & DODGE LLP
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(212) 308-4411
*Attorneys for Defendant Allied World Assurance Company
(U.S.), Inc.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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ALLIED WORLD ASSURANCE	:	
COMPANY (U.S.), INC. and ARCH	:	
INSURANCE COMPANY,	:	
	:	
Defendants.	:	
-----X	:	

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon motion of Robert W. DiUbaldo, attorney for Defendant Allied World Assurance Company (U.S.), Inc. and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

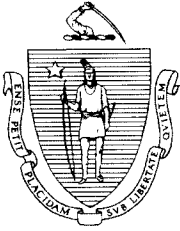
John D. Hughes, Esq.
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Boston, MA 02199
(617) 239-0100
(617) 227-4420
jhughes@eapdlaw.com

is admitted to practice *pro hac vice* counsel for Allied World in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall

forward the *pro hac vice* fee to the Clerk of Court.

Dated: June 16, 2008
New York, New York

Hon. Gerard E. Lynch



The Commonwealth of Massachusetts
SUPREME JUDICIAL COURT
FOR SUFFOLK COUNTY

JOHN ADAMS COURTHOUSE
ONE PEMBERTON SQUARE, SUITE 1300
BOSTON, MASSACHUSETTS 02108-1707

WWW.SJCCOUNTYCLERK.COM

MAURA S. DOYLE
CLERK

June 10, 2008

CASE INFORMATION (617) 557-1100
FACSIMILE (617) 557-1117

ATTORNEY SERVICES (617) 557-1050
FACSIMILE (617) 557-1055

John D. Hughes
Edwards Angell et al
111 Huntington Ave.
Boston, MA 02199

IN RE: CERTIFICATE OF ADMISSION AND GOOD STANDING

John D. Hughes:

Enclosed please find the Certificate of admission and good standing which you have recently requested from this office. This certificate attests to your date of admission and good standing at the Bar of the Commonwealth of Massachusetts.

If you have any questions or if this office can be of further assistance, please do not hesitate to contact us at 617-557-1050 or visit our web site at www.sjccountyclerk.com.

Very truly yours,

A handwritten signature in black ink, appearing to read "Maura S. Doyle", written in a cursive style.

MAURA S. DOYLE
Clerk
Supreme Judicial Court

MSD/ces
CL Received: June 10, 2008
enclosure

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the twelfth day of December A.D. 1974, said Court being the highest Court of Record in said Commonwealth:

John D. Hughes

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the

seal of said Court, this tenth day of June

in the year of our Lord two thousand and eight.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.



State of New York
Supreme Court, Appellate Division
Third Judicial Department

I, Michael J. Novack, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

John David Hughes III

having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Law in all courts of the State of New York on the 24th day of January, 2003, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Law.

In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Court, at the City of Albany, this 11th day of June, 2008.



Michael J. Novack

Clerk

Robert W. DiUbaldo
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Attorneys for Defendant Allied World Assurance Company (U.S.), Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ALLIED WORLD ASSURANCE	:
COMPANY (U.S.), INC. and ARCH	:
INSURANCE COMPANY,	:
	:
Defendants.	:
	:
-----X	:

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of June 2008, I caused a copy of Allied World's motion to admit counsel pro hac vice, an order, and accompanying affidavit to be sent by regular mail to the following:

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Nominal Defendant

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Marc E. Rindner, Esq.

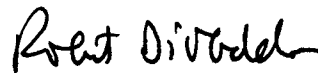
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Robert W. DiUbaldo